

**Fill in this information to identify the case:**

Debtor name U Lock Inc  
United States Bankruptcy Court for the: Western District of Pennsylvania  
Case number (if known): 22-20823

☐ Check if this is an amended filing

**Official Form 207****Statement of Financial Affairs for Non-Individuals Filing for Bankruptcy****04/22**

The debtor must answer every question. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and case number (if known).

**Part 1: Income****1. Gross revenue from business**

☐ None

Identify the beginning and ending dates of the debtor's fiscal year, which may be a calendar year

**Sources of revenue**  
Check all that apply

**Gross revenue**  
(before deductions and exclusions)

**From the beginning of the fiscal year to filing date:**

From 01/01/2022 to Filing date  
MM / DD / YYYY

☒ Operating a business  
☒ Other

\$ 8,400.00

**For prior year:**

From 01/01/2021 to 12/31/2021  
MM / DD / YYYY

☒ Operating a business  
☐ Other

\$ 13,200.00

**For the year before that:**

From 01/01/2020 to 12/31/2020  
MM / DD / YYYY

☒ Operating a business  
☐ Other

\$ 12,000.00

**2. Non-business revenue**

Include revenue regardless of whether that revenue is taxable. *Non-business income* may include interest, dividends, money collected from lawsuits, and royalties. List each source and the gross revenue for each separately. Do not include revenue listed in line 1.

☐ None

**Description of sources of revenue**

**Gross revenue from each source**  
(before deductions and exclusions)

**From the beginning of the fiscal year to filing date:**

From 01/01/2022 to Filing date  
MM / DD / YYYY

storage rentals and scrap

\$ 975.00

**For prior year:**

From 01/01/2021 to 12/31/2021  
MM / DD / YYYY

\$ 0.00

**For the year before that:**

From 01/01/2020 to 12/31/2020  
MM / DD / YYYY

\$ 0.00

Part 2: List Certain Transfers Made Before Filing for Bankruptcy

3. Certain payments or transfers to creditors within 90 days before filing this case

List payments or transfers—including expense reimbursements—to any creditor, other than regular employee compensation, within 90 days before filing this case unless the aggregate value of all property transferred to that creditor is less than \$7,575. (This amount may be adjusted on 4/01/23 and every 3 years after that with respect to cases filed on or after the date of adjustment.)

☒ None

Creditor's name and address	Dates	Total amount or value	Reasons for payment or transfer <i>Check all that apply</i>
3.1.  Creditor's name		\$	<input type="checkbox"/> Secured debt <input type="checkbox"/> Unsecured loan repayments <input type="checkbox"/> Suppliers or vendors <input type="checkbox"/> Services <input type="checkbox"/> Other
3.2.  Creditor's name		\$	<input type="checkbox"/> Secured debt <input type="checkbox"/> Unsecured loan repayments <input type="checkbox"/> Suppliers or vendors <input type="checkbox"/> Services <input type="checkbox"/> Other

4. Payments or other transfers of property made within 1 year before filing this case that benefited any insider

List payments or transfers, including expense reimbursements, made within 1 year before filing this case on debts owed to an insider or guaranteed or cosigned by an insider unless the aggregate value of all property transferred to or for the benefit of the insider is less than \$7,575. (This amount may be adjusted on 4/01/25 and every 3 years after that with respect to cases filed on or after the date of adjustment.) Do not include any payments listed in line 3. *Insiders* include officers, directors, and anyone in control of a corporate debtor and their relatives; general partners of a partnership debtor and their relatives; affiliates of the debtor and insiders of such affiliates; and any managing agent of the debtor. 11 U.S.C. § 101(31).

☐ None

Insider's name and address	Dates	Total amount or value	Reasons for payment or transfer
4.1. Christine Biros Insider's name 435 Millers Lane Pittsburgh, PA 15239	01/25/2022	\$ 0.00	Transfer, or partial transfer, of 14140 Route 30 property, Westmoreland County tax map 54-03-10-0-103 , on January 25, 2022.
Relationship to debtor insider, affiliate, and person in control of corp			See attached explanation of insider status of Christine Biros.
4.2. BIROS IRREVOCABLE LIFE INSURANCE T Insider's name 3001 Jacks Run Road McKeesport, PA 15131	02/11/2022	\$ Unknown	Biros Irrevocable Life Insurance Trust placed a mortgage lien on 14140 U.S. Route 30 property without consideration.
Relationship to debtor Insider, Affiliate, Person in Control			

**5. Repossessions, foreclosures, and returns**

List all property of the debtor that was obtained by a creditor within 1 year before filing this case, including property repossessed by a creditor, sold at a foreclosure sale, transferred by a deed in lieu of foreclosure, or returned to the seller. Do not include property listed in line 6.

☐ None

	Creditor's name and address	Description of the property	Date	Value of property
5.1.	Christine Biros Creditor's name 435 Miller Pittsburgh, PA 15239			\$ 1,900,000.00
5.2.				\$

**6. Setoffs**

List any creditor, including a bank or financial institution, that within 90 days before filing this case set off or otherwise took anything from an account of the debtor without permission or refused to make a payment at the debtor's direction from an account of the debtor because the debtor owed a debt.

☒ None

Creditor's name and address	Description of the action creditor took	Date action was taken	Amount
			\$

Last 4 digits of account number: XXXX- \_\_\_\_\_

**Part 3: Legal Actions or Assignments**

**7. Legal actions, administrative proceedings, court actions, executions, attachments, or governmental audits**

List the legal actions, proceedings, investigations, arbitrations, mediations, and audits by federal or state agencies in which the debtor was involved in any capacity—within 1 year before filing this case.

☐ None

	Case title	Nature of case	Court or agency's name and address	Status of case
7.1.	Shanni Snyder v. U Lock Inc et al	Writ of summons and lis pendens related to 14140 U.S. Route 30, North Huntingdon PA 15642	Court of Common Pleas of Westmoreland County 2 North Main Street Greensburg, PA 15601	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
	Case number 22 CJ 00928			
7.2.	Christine Biros v. U Lock Inc.	Creditor prosecuted a petition se	Court of Common Pleas of Westmoreland County 2 North Main Street Greensburg, PA 15601	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
	Case number 17 CJ 4886			

8. Assignments and receivership

List any property in the hands of an assignee for the benefit of creditors during the 120 days before filing this case and any property in the hands of a receiver, custodian, or other court-appointed officer within 1 year before filing this case.

☒ None

Custodian's name and address	Description of the property	Value
<div>Custodian's name</div>		\$
	Case title	Court name and address
		<div>Name</div>
	Case number	
	Date of order or assignment	

Part 4: Certain Gifts and Charitable Contributions

9. List all gifts or charitable contributions the debtor gave to a recipient within 2 years before filing this case unless the aggregate value of the gifts to that recipient is less than \$1,000

☒ None

Recipient's name and address	Description of the gifts or contributions	Dates given	Value
9.1. <div>Recipient's name</div>			\$
			\$
<div>Recipient's relationship to debtor</div>			
			\$
9.2. <div>Recipient's name</div>			\$
			\$
<div>Recipient's relationship to debtor</div>			

Part 5: Certain Losses

10. All losses from fire, theft, or other casualty within 1 year before filing this case.

☒ None

Description of the property lost and how the loss occurred	Amount of payments received for the loss <small>If you have received payments to cover the loss, for example, from insurance, government compensation, or tort liability, list the total received. List unpaid claims on Official Form 106A/B (Schedule A/B: Assets – Real and Personal Property).</small>	Date of loss	Value of property lost
			\$

**Part 6: Certain Payments or Transfers**

**11. Payments related to bankruptcy**

List any payments of money or other transfers of property made by the debtor or person acting on behalf of the debtor within 1 year before the filing of this case to another person or entity, including attorneys, that the debtor consulted about debt consolidation or restructuring, seeking bankruptcy relief, or filing a bankruptcy case.

☒ None

Who was paid or who received the transfer?	If not money, describe any property transferred	Dates	Total amount or value
11.1. _____ Address		_____	\$ _____

Email or website address

\_\_\_\_\_

Who made the payment, if not debtor?

\_\_\_\_\_

Who was paid or who received the transfer?	If not money, describe any property transferred	Dates	Total amount or value
11.2. _____ Address		_____	\$ _____

Email or website address

\_\_\_\_\_

Who made the payment, if not debtor?

\_\_\_\_\_

**12. Self-settled trusts of which the debtor is a beneficiary**

List any payments or transfers of property made by the debtor or a person acting on behalf of the debtor within 10 years before the filing of this case to a self-settled trust or similar device.

Do not include transfers already listed on this statement.

☒ None

Name of trust or device	Describe any property transferred	Dates transfers were made	Total amount or value
_____		_____	\$ _____
Trustee			
_____			

### 13. Transfers not already listed on this statement

List any transfers of money or other property—by sale, trade, or any other means—made by the debtor or a person acting on behalf of the debtor within 2 years before the filing of this case to another person, other than property transferred in the ordinary course of business or financial affairs. Include both outright transfers and transfers made as security. Do not include gifts or transfers previously listed on this statement.

☒ None

Who received transfer?	Description of property transferred or payments received or debts paid in exchange	Date transfer was made	Total amount or value
13.1. _____		_____	\$ _____
Address _____			
Relationship to debtor _____			
13.2. _____		_____	\$ _____
Address _____			
Relationship to debtor _____			

### Part 7: Previous Locations

#### 14. Previous addresses

List all previous addresses used by the debtor within 3 years before filing this case and the dates the addresses were used.

☒ Does not apply

Address	Dates of occupancy	
	From	To
14.1. _____	_____	_____
14.2. _____	_____	_____

**Part 8: Health Care Bankruptcies**

**15. Health Care bankruptcies**

Is the debtor primarily engaged in offering services and facilities for:

- diagnosing or treating injury, deformity, or disease, or
- providing any surgical, psychiatric, drug treatment, or obstetric care?

- ☒ No. Go to Part 9.  
☐ Yes. Fill in the information below.

Facility name and address

Nature of the business operation, including type of services the debtor provides

If debtor provides meals and housing, number of patients in debtor's care

15.1. \_\_\_\_\_  
Facility name

Location where patient records are maintained (if different from facility address). If electronic, identify any service provider.

How are records kept?

Check all that apply:

- ☐ Electronically  
☐ Paper

Facility name and address

Nature of the business operation, including type of services the debtor provides

If debtor provides meals and housing, number of patients in debtor's care

15.2. \_\_\_\_\_  
Facility name

Location where patient records are maintained (if different from facility address). If electronic, identify any service provider.

How are records kept?

Check all that apply:

- ☐ Electronically  
☐ Paper

**Part 9: Personally Identifiable Information**

**16. Does the debtor collect and retain personally identifiable information of customers?**

- ☐ No.  
☒ Yes. State the nature of the information collected and retained. name, address, telephone number

Does the debtor have a privacy policy about that information?

- ☒ No  
☐ Yes

**17. Within 6 years before filing this case, have any employees of the debtor been participants in any ERISA, 401(k), 403(b), or other pension or profit-sharing plan made available by the debtor as an employee benefit?**

- ☒ No. Go to Part 10.  
Yes. Does the debtor serve as plan administrator?

- ☐ No. Go to Part 10.  
☐ Yes. Fill in below:

Name of plan

Employer identification number of the plan

\_\_\_\_\_

EIN: \_\_\_\_\_

Has the plan been terminated?

- ☐ No  
☐ Yes

Part 10: Certain Financial Accounts, Safe Deposit Boxes, and Storage Units

18. Closed financial accounts

Within 1 year before filing this case, were any financial accounts or instruments held in the debtor's name, or for the debtor's benefit, closed, sold, moved, or transferred?  
Include checking, savings, money market, or other financial accounts; certificates of deposit; and shares in banks, credit unions, brokerage houses, cooperatives, associations, and other financial institutions.

☒ None

	Financial institution name and address	Last 4 digits of account number	Type of account	Date account was closed, sold, moved, or transferred	Last balance before closing or transfer
18.1.	<div>Name</div>	XXXX—	<input type="checkbox"/> Checking <input type="checkbox"/> Savings <input type="checkbox"/> Money market <input type="checkbox"/> Brokerage <input type="checkbox"/> Other		\$
18.2.	<div>Name</div>	XXXX—	<input type="checkbox"/> Checking <input type="checkbox"/> Savings <input type="checkbox"/> Money market <input type="checkbox"/> Brokerage <input type="checkbox"/> Other		\$

19. Safe deposit boxes

List any safe deposit box or other depository for securities, cash, or other valuables the debtor now has or did have within 1 year before filing this case.

☒ None

Depository institution name and address	Names of anyone with access to it	Description of the contents	Does debtor still have it?
<div>Name</div>			<input type="checkbox"/> No <input type="checkbox"/> Yes
	<div>Address</div>		

20. Off-premises storage

List any property kept in storage units or warehouses within 1 year before filing this case. Do not include facilities that are in a part of a building in which the debtor does business.

☒ None

Facility name and address	Names of anyone with access to it	Description of the contents	Does debtor still have it?
<div>Name</div>			<input type="checkbox"/> No <input type="checkbox"/> Yes
	<div>Address</div>		

Part 11: Property the Debtor Holds or Controls That the Debtor Does Not Own

21. Property held for another

List any property that the debtor holds or controls that another entity owns. Include any property borrowed from, being stored for, or held in trust. Do not list leased or rented property.

☒ None

Owner's name and address	Location of the property	Description of the property	Value
<div> <div></div> <div>Name</div> </div>			\$

Part 12: Details About Environmental Information

For the purpose of Part 12, the following definitions apply:

- Environmental law* means any statute or governmental regulation that concerns pollution, contamination, or hazardous material, regardless of the medium affected (air, land, water, or any other medium).
- Site* means any location, facility, or property, including disposal sites, that the debtor now owns, operates, or utilizes or that the debtor formerly owned, operated, or utilized.
- Hazardous material* means anything that an environmental law defines as hazardous or toxic, or describes as a pollutant, contaminant, or a similarly harmful substance.

Report all notices, releases, and proceedings known, regardless of when they occurred.

22. Has the debtor been a party in any judicial or administrative proceeding under any environmental law? Include settlements and orders.

☒ No
 ☐ Yes. Provide details below.

Case title	Court or agency name and address	Nature of the case	Status of case
<div> <div></div> <div>Case number</div> </div>	<div> <div></div> <div>Name</div> </div>		<input type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded

23. Has any governmental unit otherwise notified the debtor that the debtor may be liable or potentially liable under or in violation of an environmental law?

☒ No
 ☐ Yes. Provide details below.

Site name and address	Governmental unit name and address	Environmental law, if known	Date of notice
<div> <div></div> <div>Name</div> </div>	<div> <div></div> <div>Name</div> </div>		<div> <div></div> </div>

24. Has the debtor notified any governmental unit of any release of hazardous material?

- ☒ No
- ☐ Yes. Provide details below.

Site name and address	Governmental unit name and address	Environmental law, if known	Date of notice
<div>Name</div>	<div>Name</div>		

Part 13: Details About the Debtor’s Business or Connections to Any Business

25. Other businesses in which the debtor has or has had an interest

List any business for which the debtor was an owner, partner, member, or otherwise a person in control within 6 years before filing this case. Include this information even if already listed in the Schedules.

- ☒ None

Business name and address	Describe the nature of the business	Employer Identification number Do not include Social Security number or ITIN.
25.1. <div>Name</div>		<div>EIN: </div> <div>Dates business existed</div> <div>From  To </div>
Business name and address	Describe the nature of the business	Employer Identification number Do not include Social Security number or ITIN.
25.2. <div>Name</div>		<div>EIN: </div> <div>Dates business existed</div> <div>From  To </div>
Business name and address	Describe the nature of the business	Employer Identification number Do not include Social Security number or ITIN.
25.3. <div>Name</div>		<div>EIN: </div> <div>Dates business existed</div> <div>From  To </div>

**26. Books, records, and financial statements**

26a. List all accountants and bookkeepers who maintained the debtor's books and records within 2 years before filing this case.

☒ None

Name and address

Dates of service

26a.1.

Name

From \_\_\_\_\_

To \_\_\_\_\_

Name and address

Dates of service

26a.2.

Name

From \_\_\_\_\_

To \_\_\_\_\_

26b. List all firms or individuals who have audited, compiled, or reviewed debtor's books of account and records or prepared a financial statement within 2 years before filing this case.

☒ None

Name and address

Dates of service

26b.1.

Name

From \_\_\_\_\_

To \_\_\_\_\_

Name and address

Dates of service

26b.2.

Name

From \_\_\_\_\_

To \_\_\_\_\_

26c. List all firms or individuals who were in possession of the debtor's books of account and records when this case is filed.

☒ None

Name and address

If any books of account and records are  
unavailable, explain why

26c.1.

Name

Debtor

U Lock Inc

Name

Case number (if known) 22-20823

**Name and address**

**If any books of account and records are unavailable, explain why**

26c.2.

Name

26d. List all financial institutions, creditors, and other parties, including mercantile and trade agencies, to whom the debtor issued a financial statement within 2 years before filing this case.

☒ None

**Name and address**

26d.1.

Name

**Name and address**

26d.2.

Name

**27. Inventories**

Have any inventories of the debtor's property been taken within 2 years before filing this case?

☒ No

☐ Yes. Give the details about the two most recent inventories.

**Name of the person who supervised the taking of the inventory**

**Date of  
inventory**

**The dollar amount and basis (cost, market, or  
other basis) of each inventory**

\_\_\_\_\_

\_\_\_\_\_

\$ \_\_\_\_\_

**Name and address of the person who has possession of inventory records**

27.1.

Name

Name of the person who supervised the taking of the inventory		Date of inventory	The dollar amount and basis (cost, market, or other basis) of each inventory
			\$

Name and address of the person who has possession of inventory records

27.2. Name

28. List the debtor's officers, directors, managing members, general partners, members in control, controlling shareholders, or other people in control of the debtor at the time of the filing of this case.

Name	Address	Position and nature of any interest	% of interest, if any
John Biros	1 Biros Hill Way, McKeesport, PA 15131	silent partner from inception	25

29. Within 1 year before the filing of this case, did the debtor have officers, directors, managing members, general partners, members in control of the debtor, or shareholders in control of the debtor who no longer hold these positions?

☐ No
 ☒ Yes. Identify below.

Name	Address	Position and nature of any interest	Period during which position or interest was held
Christine Biros	435 Miller Lane Pittsburgh PA 15239	See attached, silent partner of business	07/09/2015 To
			To
			To
			To

30. Payments, distributions, or withdrawals credited or given to insiders

Within 1 year before filing this case, did the debtor provide an insider with value in any form, including salary, other compensation, draws, bonuses, loans, credits on loans, stock redemptions, and options exercised?
 

☒ No
 ☐ Yes. Identify below.

Name and address of recipient	Amount of money or description and value of property	Dates	Reason for providing the value
30.1. Name			
Relationship to debtor			

**Name and address of recipient**

30.2

Name

**Relationship to debtor**

31. Within 6 years before filing this case, has the debtor been a member of any consolidated group for tax purposes?

- ☒ No  
☐ Yes. Identify below.

**Name of the parent corporation**

**Employer Identification number of the parent corporation**

EIN: \_\_\_\_\_

32. Within 6 years before filing this case, has the debtor as an employer been responsible for contributing to a pension fund?

- ☒ No  
☐ Yes. Identify below.

**Name of the pension fund**

**Employer Identification number of the pension fund**

EIN: \_\_\_\_\_

**Part 14: Signature and Declaration**

**WARNING** -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

I have examined the information in this *Statement of Financial Affairs* and any attachments and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 07/06/2022  
MM / DD / YYYY

**X**

/s/ George Snyder

Printed name George Snyder

Signature of individual signing on behalf of the debtor

Position or relationship to debtor Director

Are additional pages to *Statement of Financial Affairs for Non-Individuals Filing for Bankruptcy* (Official Form 207) attached?

- ☐ No  
☒ Yes

**Continuation Sheet for Official Form 207**

**7) Legal Actions**

Christine Biros v. U Lock

Supreme Court petition for leave to appeal. While denied, the court did not remit the record because it extended the time and this bankruptcy stayed the case.

Supreme Court of Pennsylvania

Pending

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Christine Biros v. U Lock

1841 WDA 2019

This is the appeal from the decision awarding Christine Biros a constructive trust. It is still active because the Court never remitted the record due to the pending status in the PA Supreme Court.

Superior Court of Pennsylvania

Pending

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Shanni Snyder v. U Lock

21 JU 4758

Creditor filed federal judgment with Court of Common Pleas to register the judgment as a lien on all property.

Court of Common Pleas of Westmoreland County

2 North Main Street, Greensburg, PA 15601

Concluded

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Christine Biros v. U Lock

17 CJ 04886

Creditor filed a Petition for Possession BUT NEVER FILED IT WITH THE PROTHONOTARY. Court issued Order May 17 2022 awarding possession.

Court of Common Pleas

2 North Main Street, Greensburg, PA 15601

Pending

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Biros v. U Lock Shanni Snyder Appellant

Debtor Name U Lock Inc

Case number (if known) 22-20823

**Continuation Sheet for Official Form 207**

607 WDA 2022

Shanni Snyder appeals the levy on U Lock's personal property asserting it interfered with her judgment

Superior Court of Pennsylvania

Pending

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Christine Biros v. U Lock

615 WDA 2022

U Lock appeals an ex parte order releasing a deed to Christine Biros prior to the court regaining jurisdiction.

Superior Court of Pennsylvania

Pending

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Christine Biros v. U Lock

617 WDA 2022

U Lock appeals a writ of possession that was filed notwithstanding no action in ejectment ever having been filed against it.

Superior Court of Pennsylvania

Pending

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Christine Biros v U Lock     Mark Mycka Appellant

650 WD 2022

Tenant appeals the writ of possession awarded to Christine Biros without notice to the persons occupying the property.

Superior Court of Pennsylvania

Pending

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## INSIDER STATUS OF CHRISTINE BIROS, JOHN BIROS, and BIROS IRREVOCABLE INSURANCE TRUST

The following information is provided to show the insider status of Christine Biros and the Biros, i.e., that she constitutes a person in control of or an affiliate of U Lock Inc. equivalent to, or similar to, a silent officer or shareholder. U Lock is not alleging that Christine Biros or the Biros Irrevocable Life Insurance Trust engaged in any form of criminal activity or that the funds came from unlawful activity. (Based on information, the source of the funds were actually an unincorporated association).

If the transfer of the property, and all interest in the property was actually transferred (see attachment to Schedule A/B part 9, and attachment thereto), it constitutes an involuntary transfer of assets to an insider unsecured creditor. Specifically, the Court of Common Pleas of Westmoreland County, Pennsylvania, specifically found that deeds issued in 2018 to U Lock conveyed ownership of the property. However, because of U Lock's insolvency, the Court created a constructive trust to assure that Christine Biros receives her unsecured loan returned to her. The Superior Court of Pennsylvania affirmed the decision.

Christine Biros, John Biros, and the Biros Irrevocable Life Insurance Trust (collectively "Biros Family") constitute insiders because they maintained indirect control over U Lock Inc.

Specifically, the formation of U Lock Inc. occurred as a result of a plan between George Snyder, Kash Snyder, Christine Biros, and John Biros to purchase an extremely undervalued piece of real estate on Route 30. They intended to work with Colony Holdings, a retail shopping center developer, to create a shopping plaza.

While the business had a self-storage business on it, that business only made a small amount per month (under \$2000). In other words, when providing the money for the purchase of the property, Christine and John Biros necessarily knew that there was not sufficient income to make payments on any loan. Christine and John Biros knew that George Snyder and Kash Snyder had minimal savings and were reliant on the Biros' to provide additional funding to develop the property.

Prior to the formation of U Lock, Christine Biros and John Biros participated in multiple meetings with George and sometimes Kash Snyder relating to the property. Meetings occurred at least once a week with John Biros, and sometimes with Christine Biros.

Immediately prior to the purchase of the U Lock property in 2015, discussions occurred as to what names should be on the corporate papers. This was near the time that agents of the Attorney General of Pennsylvania raided the home of Robert Biros and seized a large sum of cash. Christine Biros and John Biros advised George Snyder that they did not want their names on the corporate papers until that investigation was complete.

It was not until the day of the purchase of the property in July 2015 that Christine Biros had Kash Snyder write on a piece of paper that the payment constituted a loan and that terms and conditions of the loan would be set thereafter. Christine Biros advised Kash Snyder that she needed something to show her loan but did not want a public document showing any involvement.

From the purchase of the property in July 2015 through mid-2017, weekly "board-type" meetings occurred between George Snyder and Christine Snyder discussing the progress of the project, etc. George Snyder repeatedly advised that he thought the property should be developed, but Christine Biros and John Biros directed that the property not be developed until the matters with the Attorney General of Pennsylvania were settled.

During 2015 and 2016, John Biros on behalf of himself and Christine Biros, paid a couple thousand dollars per month towards equipment and fuel that was used to make improvements on the property (roadwork, parking, and grading).

During some meetings, a discussion of taxes occurred. Christine Biros conveyed to George Snyder that federal taxes should not be filed if they would need to list her or John Biros as an owner of the property until after the Attorney General matter closed.

In or around 2017, when discussions occurred as to possibly removing Christine Biros and John Biros from corporate involvement and simply returning the money because George Snyder located an investor who wanted to partner for developing the property (C. Dull), Christine Biros voiced an objection and stated that she wanted her brother John Biros to remain a partner.

During 2017 when an unsigned demand letter was provided (authored by William Otto, but with Christine Biros listed as the writer, but no signature), both John Biros and Christine Biros informed George Snyder that they had to provide the letter because Robert Biros found out about the transaction and that they would have discussions with him to try to alleviate the situation. John Biros specifically told George Snyder not to sign the letter.

During 2017, Christine Biros allowed her father, Robert Biros, to place two large trailers on the property that he removed from a trailer park they operate. Those trailers remain.

Even after Christine Biros filed her lawsuit, additional meetings occurred between the Biros' and U Lock's officers. When the Biros family was criminally charged in July 2018, John Biros met with George Snyder and advised that he was charged and that Christine Biros was too busy to deal with the lawsuit. At that time, Christine Biros did indeed pause her lawsuit, but the pause was short lived.

From 2015 through late 2021, John Biros provided his vehicle to U Lock to act as a company vehicle.

## CLARIFICATION AS TO FILING AND BANKRUPTCY FEES

1. This was an involuntary petition. The filing fees were paid by the Petitioner.
2. Prior to the bankruptcy, no attorney fees were paid.
3. Because of the abrupt notice of the bankruptcy, counsel for the debtor appeared without securing payment. Therefore, counsel waived pre "Order for Relief" fees associated with this case.
4. Counsel has filed the post-Order for Relief statement advising of the fees that will be billed or attempted to be billed.
5. The filing fee for the motion to convert were paid by the officer of the corporation through his personal funds. Funds from the estate were not used to pay the filing fee.